

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

UNITED STATES OF AMERICA, )  
                                )  
Plaintiff,                 )  
                                ) Cause No. 4:18CR00876JAR/NCC  
v.                            )  
                                )  
ASHU JOSHI,                )  
                                )  
Defendant.                 )

**DEFENDANT'S SIXTH MOTION FOR EXTENSION OF TIME  
TO FILE PRE-TRIAL MOTIONS**

Comes now, Counsel for Defendant, Ashu Joshi, and respectfully requests a forty-five-day extension of the filing deadline for pre-trial motions. In support of this motion, Counsel states as follows:

1.      Defendant has been charged with one count of Production of Child Pornography, one count of Transportation of a Minor Across State Lines and one count of Receipt of Child Pornography. If convicted Defendant faces the possibility of significant prison time including a mandatory minimum of 15 years and on one count up to Life.
2.      The Court has made a finding that this case was a complex case for purposes of the Speedy Trial Act.
3.      Defense Counsel needs additional time to investigate and research the case. The matter involves an investigation conducted by a social media company, the National Center for Missing & Exploited Children, the St. Louis County Police Department, and the Bowling Green Kentucky Police Department. The discovery is voluminous and has taken counsel considerable time to review.

4. Discovery and investigation are still ongoing. The Government has been working with defense counsel to provide supplemental discovery requested by the defense. The defense has identified a number of arguably suppressible events. The defense continues to research these matters.

5. Counsel has not yet received a report from a private evaluation conducted on the Defendant. The psychologist preparing the report had to undergo eye surgery which has delayed completion of the report.

6. Given the volume of discovery, the serious nature of the charges, and the Court's complex case designation Counsel respectfully requests additional time to file motions.

7. Once discovery, investigation, and research are completed, Counsel anticipates continuing settlement discussions with the Government. If a settlement is reached this may alleviate the necessity of pretrial motions.

8. It is Counsel's understanding that a trial date has not been set for the cause.

9. Counsel has discussed this request with Assistant United States Attorney Colleen Lang who has no objection.

10. This request for an extension of time is made in good faith for all the reasons listed herein and not to vex or harass the Court or the Government, but to ensure Defendant's Sixth Amendment right to effective assistance of counsel. The ends of justice will be best served by excluding these periods of delay from calculating deadlines that would otherwise apply. 18 U.S.C. §3161(h)(7)(A) and (B)(iv).

WHEREFORE, for the foregoing reasons Counsel for Defendant requests a forty-five-day extension of the deadline to file pre-trial motions.

Respectfully submitted,

FRANK, JUENGEL & RADEFELD,  
ATTORNEYS AT LAW, P.C.

By /s/ Daniel A. Juengel  
DANIEL A. JUENGEL (#42784MO)  
Attorneys for Defendant  
7710 Carondelet Avenue, Suite 350  
Clayton, Missouri 63105  
(314) 725-7777

**CERTIFICATE OF SERVICE**

I hereby certify that on August 22, 2019, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following.

Colleen Lang  
Asst. United States Attorney  
111 South Tenth Street, 20<sup>th</sup> Floor  
St. Louis, Missouri, 63102

/s/ Daniel A. Juengel  
DANIEL A. JUENGEL